

**MPM Silicones, LLC Sistersville Plant**

3500 South State Route 2
Friendly, WV 26146
momentive.com

January 30, 2012

CERTIFIED MAIL 7006 0810 0001 6934 8946

Mr. Don Martin
Office of Environmental Remediation
WVDEP – Division of Water and Waste Management
601 57th Street
Charleston, WV 25304

Re: 2011 Annual Corrective Action Report
MPM Silicones, LLC – Sistersville Plant
EPA ID No.: WVD004325353

Dear Mr. Martin:

This letter report is MPM Silicones, LLC's annual corrective action report for 2011. It is being submitted to you as specified in Module X, Section H-2 of our hazardous waste management renewal permit, which became effective on May 30, 2008.

1. Introduction:

The Permit requires corrective actions at the Facility for four specific areas, summarized as follows:

Permit Reference	Corrective Action Area	Corrective Action Requirements
G-3b	North Inactive Site	Earthen cover inspection & maintenance Annual groundwater monitoring
G-3c	South Inactive Site	Ground cover inspection Quarterly groundwater monitoring
G-3d	Waste Water Treatment System	Equipment inspection Surface impoundment leak rate monitoring
G-3e	No. 3 Sludge Pond and BTEX Area	Groundwater recovery well operation Quarterly groundwater monitoring

2. Work Completed During the year:

G-3b North Inactive Site – Work completed during the year included inspection, maintenance and groundwater monitoring activities. The earthen cover, diversion ditches and the banks of Sugar Camp Run were inspected in January, April, July, and October. Drainage ditches were cleaned in August and November. The annual mowing was completed in July. Annual groundwater sampling was completed in June.

G-3c South Inactive Site – Work completed during the year included inspection, maintenance and groundwater monitoring activities. Quarterly ground cover inspections were performed in conjunction with quarterly groundwater sampling conducted in March, June, September and October. A culvert was installed in June to channel stormwater runoff to prevent potential erosion of the ground cover.

G-3d Waste Water Treatment System – Work completed during the year included equipment inspection, video inspection and lining of process sewer lines, removal of sludge from the surface impoundments, and surface impoundment leak rate monitoring and reporting.

The east primary clarifier was shut down and inspected in April. The east UNOX reactor was shut down and inspected in October.

The terminal manhole and neutralization pit were inspected during the August plant-wide electrical shutdown. Approximately 1,080 feet of main process sewer lines were video inspected and approximately 925 feet were lined during the shutdown.

Approximately 508,500 pounds of sludge were removed from the surface impoundments, dewatered, and disposed of in the on-site hazardous waste landfill in September/October.

The permit requires monitoring of surface impoundment leakage rates, but only requires sampling and reporting if monthly average leakage rates exceed 750 gallons per day. Daily monitoring results were reviewed weekly and monthly average leakage rates for both impoundments were less than 188 gallons per day throughout 2011.

G-3e No.3 Sludge Pond and BTEX Area – Work completed during the year included continued operation and maintenance of groundwater recovery well # 4315 and groundwater monitoring activities.

Operation of groundwater recovery well #4315 was interrupted on March 8 due to damage caused by a lightning strike. Electrical repairs were made and the well returned to service on March 11. The well operated normally and without incident the rest of the year.

Quarterly groundwater sampling was completed in March, June, September and October.

The groundwater flow direction was evaluated to verify that contaminants from the North Inactive Site, No. 3 Sludge Pond and BTEX Area are continuing to be captured by the recovery well.

3. Groundwater sampling data:

G-3b North Inactive Site – Groundwater results for monitoring wells NF-1 through NF-9 for the analytes specified in Condition X-G-3(b)(iv)(1) of the permit are attached.

1,1-Dichloroethane was detected in monitoring well NF-8 at 5.25 ug/L. USEPA has not established a maximum contaminate level (MCL) for 1,1-Dichloroethane.

Chlorobenzene was detected in monitoring wells NF-7 and NF-8 at levels ranging from 1.11 to 52.4 ug/L. All results were below the 100 ug/L MCL for chlorobenzene.

Dichloroethylene (cis-1,2) was detected in monitoring well NF-7 at 1.27 ug/l, below the 70 ug/L MCL for Dichloroethylene (cis-1,2).

Results for all other specified analytes in all wells were below detection limits.

G-3c South Inactive Site – Groundwater results for monitoring wells 5701, 5702, 5703, 5704, 5705 and 2701-R for the analytes specified in Condition X-G-3(c)(ii)(1) of the permit are attached.

Benzene was detected in monitoring well 5704 in the second, third and fourth quarters at levels ranging from 5.6 to 81.1 ug/L. These results were all above the 5 ug/L MCL for benzene.

Dichloroethylene (cis-1,2) was detected in monitoring well 5704 in the second, third and fourth quarters at levels ranging from 2.35 to 15.4 ug/l. All results were below the 70 ug/L MCL for Dichloroethylene (cis-1,2).

Results for all other specified analytes in all wells were below detection limits.

G-3e No.3 Sludge Pond and BTEX Area – Groundwater monitoring results for monitoring wells 20 and 3203 for the analytes specified in Condition X-G-3(e)(vii) of the permit are attached.

Chlorobenzene was detected in monitoring well 20 in the second, third, and fourth quarters at levels ranging from 1.7 to 2.9 ug/L. All results were below the 100 ug/L MCL for chlorobenzene.

Dichloroethylene (cis-1,2) was detected in monitoring well 20 in the second, third and fourth quarters and in monitoring well 3203 in the third and fourth quarters at levels ranging from 1.6 to 5.75 ug/L. All results were below the 70 ug/L MCL for dichloroethylene (cis-1,2).

4. Changes made during the year:

G-3b, G-3c, G-3d and G-3e – No changes were made during 2011.

5. Summary of problems encountered and actions taken:

G-3b, G-3c, G-3d – No problems were encountered.

G-3e No.3 Sludge Pond and BTEX Area - Operation of groundwater recovery well #4315 was interrupted on March 8 due to damage caused by a lightening strike. Electrical repairs were made and the well returned to service on March 11.

6. Projected work for next year:

G-3b North Inactive Site – Inspection and maintenance activities (annual mowing, brush and weed control, cleaning drainage ditches) will be conducted according to the schedule in condition X-G-3(b)(ii) of the permit. Annual groundwater monitoring will be conducted.

G-3c South Inactive Site – Inspection of the ground cover and groundwater monitoring will be conducted quarterly.

G-3d Waste Water Treatment System - We plan to shut down and inspect the west primary clarifier in the spring and the west UNOX reactor in the fall and will continue to monitor leakage rates of the surface impoundments.

G-3e No.3 Sludge Pond and BTEX Area - We will continue to operate groundwater recovery well #4315. The groundwater flow direction will be evaluated to verify that contaminants from the North Inactive Site, No. 3 Sludge Pond and BTEX Area are continuing to be captured by the recovery well. Groundwater monitoring will be conducted quarterly.

As required by Condition I-I of our permit, the following certification is being made:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions concerning this report, please contact Steve Klarman at (304) 652-8306 or by email at steven.klarman@momentive.com.

Sincerely,
MPM SILICONES, LLC



Daniel J. Beringer
Plant Manager

attachments

cc: Mark Leskowicz - MPM
Steve Klarman - MPM
Steve Freed - MPM
Jason Martin - MPM
Sanat Bhavsar - MPM
Ray Hiley - MPM
Paul Z. Meyer- Chemtura
Talal Fathallah - WVDEP
Bill Wentworth - USEPA
Sudhir Patel - WVDEP
State Correspondence File

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MPM Silicones LLC - Sistersville Site
2011 RCRA Corrective Action Groundwater Monitoring - North Inactive Site

		1,1-Dichloroethane	Benzene	Chlorobenzene	Dichloroethylene (cis-1,2)	Dichloroethylene (-trans-1,2)	Toluene
Well	Quarter	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
NF-1	2	0	0	0	0	0	0
NF-2	2	0	0	0	0	0	0
NF-3A	2	0	0	0	0	0	0
NF-4	2	0	0	0	0	0	0
NF-5A	2	0	0	0	0	0	0
NF-6	2	0	0	0	0	0	0
NF-7	2	0	0	1.11	1.27	0	0
NF-8	2	5.25	0	52.4	0	0	0
NF-9	2	0	0	0	0	0	0

MPM Silicones LLC - Sistersville Site
2011 RCRA Corrective Action Groundwater Monitoring - South Inactive Site

		1,1,1- Trichloroethane	1,1- Dichloroethane	1,2- Dichloroethane	Acrylonitrile	Benzene	Chlorobenzene	Dichloroethylene (cis-1,2)	Dichloroethylene (-trans-1,2)	Ethylbenzene	m,p- Xylene	o- Xylene	Methyl chloride	Toluene
Well	Quarter	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
2701-R	1	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0
	4	0	0	0	0	0	0	0	0	0	0	0	0	0
5701	1	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0
	4	0	0	0	0	0	0	0	0	0	0	0	0	0
5702	1	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0
	4	0	0	0	0	0	0	0	0	0	0	0	0	0
5703	1	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0
	4	0	0	0	0	0	0	0	0	0	0	0	0	0
5704	1	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	5.6	0	2.35	0	0	0	0	0	0
	3	0	0	0	0	81.1	0	15.4	0	0	0	0	0	0
	4	0	0	0	0	5.65	0	3.7	0	0	0	0	0	0
5705	1	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0
	4	0	0	0	0	0	0	0	0	0	0	0	0	0

MPM Silicones LLC - Sistersville Site
2011 RCRA Corrective Action Groundwater Monitoring - No 3 Sludge Pond & BTEX Area

		Benzene	Chlorobenzene	Dichloroethylene (cis-1,2)	Dichloroethylene (-trans-1,2)
Well	Quarter	ug/l	ug/l	ug/l	ug/l
20	1	0	0	0	0
	2	0	1.7	2.15	0
	3	0	2.9	5.75	0
	4	0	2.4	2.3	0
3203	1	0	0	0	0
	2	0	0	0	0
	3	0	0	3.9	0
	4	0	0	1.6	0